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In the Matter of)	
)	
Spectrum Policy Task Force)	
Seeks Public Comment On)	ET Docket No. 02-135
Issues Related To Commission's)	
Spectrum Policies)	

COMMENT

Comment Date: July 8, 2002

Focus on items: 22, 23 & 24

Narrative:

In the local government area, the Commission should become familiar with "how business is done". It appears that regarding trunked radio systems, "how business is done" approaches financial terrorism on local governments. This clearly is not in the public interest and the facts show a financial situation where radio products for local governments are market priced a magnitude above comparable commercial products. This situation has evolved through 40-years of vendors, rather than customers, controlling the market place. The epitome of this problem is vendor proprietary infrastructure which locks the local governments to the supplier for the life of the system (10-15 years) and thus the supplier can charge and do what they so choose. The customer has no recourse.

The impetus now for Homeland Security and a nationwide seamless communications system will never come about unless there is major regulatory restructuring. The Commission needs to be strong and not fall to the pressure of high power lobbyists. The APCO 25 system architecture will not meet national interoperability needs.

There is an opportunity now for the Commission to take a positive step through the as yet unbuilt 700MHz spectrum. The national radio system must service the national needs of: local, state and federal agencies, and be integrated. The infrastructure must be open and not vendor proprietary. The mobile switch now being talked about and deployed is only a band-aid fix and does not provide seamless, full feature capability to the visiting subscribers on the host's infrastructure.


We suggest patterning the regulatory and business structure after the common carrier systems of wireline and wireless. The physical facilities should be cost effective, provided by an overlay on the existing cellular sites. The management and policy issues should be handled by a government sanctioned non-profit organization (maybe styled after the MITRE business model). This vision would permit the use of both agency specific subscriber units and the development of a new multi-mode subscriber unit that could be cellular phones, data units, private call units or dispatch units.

The Commission might want to become familiar with the procurement activities of salient systems that resulted in sole source procurements and non-professional engineer involvement regarding life, limb and property construction projects, which normally require a professional engineer, such as: Montgomery County, MD; Baltimore, MD; Albemarle County/Charlottesville/University of Virginia; Richmond, VA market area; State of Michigan; State of Delaware; Chesapeake, VA, etc.

Conclusion:

This current situation is a national challenge that is in need of correction.

Sincerely,

A handwritten signature in blue ink that reads "Frederick G. Griffin, P.E.".

Frederick G. Griffin, P.E.
President

FGG/cft

cc: NATOA c/o Bruce Anderson, Hoffman Estates
NSPE
AFCCE
VML
VaCO
VSPE